

United States Courts
Southern District of Texas
FILED

August 07, 2024

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

vs.

DARWIN RECARTE

IMMER ISMAEL CAMPOS QUINTANILLA

§
§
§
§
§
§

CRIMINAL NO. **4:24-cr-00417**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Title 18 U.S.C. §§ 924(a)(1)(A) and 2, Aiding and Abetting False Statement to a Federal Firearms Licensee)

On or about July 11, 2024, in the Houston Division of the Southern District of Texas, the defendants,

DARWIN RECARTE
IMMER ISMAEL CAMPOS QUINTANILLA

aided and abetted by one another, knowingly made a false statement and representation to A.S., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of A.S., in that DARWIN RECARTE acquired the following firearm:

- FN, M249S, 5.56 caliber rifle, SN M249SA09939

by executing a United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the aforementioned firearm, whereas in truth and in fact he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A), 924(a)(1)(D) and 2.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, the United States of America hereby gives notice that all firearms involved in, used in, or intended to be used in the commission of the offense in violation of Title 18, United States Code, Sections 924(a)(1)(A) charged in count One, are subject to forfeiture. This includes but is not limited to: one FN, M249S, 5.56 caliber rifle, SN M249SA09939.

SUBSTITUTE ASSETS

In the event that any of the property subject to forfeiture, as a result of any act or omission of any of the Defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

It is the intent of the United States to seek forfeiture of any other property of the Defendants up to the value of such property pursuant to Title 21 U.S.C. § 853(p).

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

ALAMDAR HAMDANI
UNITED STATES ATTORNEY


John S. Ganz

Assistant United States Attorney